

**BEFORE THE PUBLIC SERVICE COMMISSION
OF UTAH**

In the Matter of the Petition of :
QWEST CORPORATION for Pricing :
Flexibility for Business Services in the :
Areas Served by the American Fork, :
Brigham City, Farmington, Layton, :
Lehi, Logan, Magna, Ogden West, :
Park City, Pleasant Grove, Riverton, :
Smithfield, Spanish Fork, Springville, :
and Tooele Central Offices

Docket No. 02-049-82

DIRECT TESTIMONY

OF

WILLIAM DUNKEL

ON BEHALF OF THE COMMITTEE OF CONSUMER SERVICES

07 JANUARY 2003

1 **I. INTRODUCTION AND STATEMENT OF QUALIFICATIONS**

2
3 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

4 A. My name is William Dunkel. My business address is 8625 Farmington Cemetery Road,
5 Pleasant Plains, Illinois 62677.

6
7 **Q. WHAT IS YOUR PRESENT OCCUPATION?**

8 A. I am a consultant providing services in telephone rate proceedings. I am the principal
9 of William Dunkel and Associates, which was established in 1980. Since that time, I
10 have regularly provided consulting services in telephone regulatory proceedings
11 throughout the country. I have participated in over 140 state regulatory telephone
12 proceedings before over one-half of the state commissions in the United States. I
13 specialize in cost analysis, rate design, jurisdictional separations, and depreciation
14 studies.

15
16 **Q. HAVE YOU PREPARED AN APPENDIX THAT DESCRIBES YOUR**
17 **QUALIFICATIONS?**

18 A. Yes. My qualifications are included in Appendix A.

19
20 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING?**

21 A. I am testifying on behalf of the Utah Committee of Consumer Services (CCS).

22
23 **Q. HAVE YOU PREVIOUSLY PARTICIPATED IN PROCEEDINGS IN UTAH?**

1 A. Yes. I have participated on behalf of the CCS in many of Qwest's (also U.S. West
2 Communications or Mountain Bell Telephone Company) proceedings in Utah. Specifically, I
3 was involved in six general rate cases, Docket Numbers: 84-049-01; 88-049-07; 90-049-06/90-
4 049-03; 92-049-07; 95-049-05; 97-049-08. I was also involved in the Qwest 800 Services case,
5 Docket No. 90-049-05.

6
7 **Q. WHAT IS THE PURPOSE OF THIS TESTIMONY?**

8 A. The purpose of this testimony is to respond to Qwest's September 30, 2002 Petition for
9 Business Pricing Flexibility and the October 17, 2002 Direct Testimony of Qwest's
10 witness Mr. David L. Teitzel.

11
12 **II. SMALL BUSINESS CUSTOMERS**

13
14 **Q. DO SMALL BUSINESS CUSTOMERS HAVE THE SAME COMPETITIVE**
15 **ALTERNATIVES AS LARGE BUSINESS CUSTOMERS?**

16 A. No. Some CLECs focus their efforts on large business customers more than small
17 business customers.¹ Therefore, there will generally be more competitive alternatives
18 available to large business customers. The Public Service Commission's (Commission)
19 2002 Report to the Governor and the Legislature on the Status of Telecommunications
20 Competition in Utah (2002 Report) states that "most competition continues to be in the
21 larger business and urban markets". The 2002 Report states:

¹ For purposes of this testimony I am defining a small business to be a business with four or fewer telephone lines.

1 Though the basic purpose of federal and state legislation was to establish a new
2 regulatory model to enable the transition to a competitive telecommunications
3 industry, competition has not come to all areas of the state at the same time.
4 The need to protect consumers remains. Most competition continues to be in the
5 larger business and urban markets.²
6
7

8 **Q. DOES QWEST DEMONSTRATE THAT THE CLECS ARE ACTIVELY OFFERING**
9 **SERVICES TO SMALL BUSINESS CUSTOMERS?**

10 A. No. Qwest's Petition and Testimony produce no evidence that the CLEC's are actually
11 offering services specifically to small businesses in the areas addressed in the Petition.
12

13 **Q. IF A CLEC IS CERTIFIED TO PROVIDE TELEPHONE SERVICE IN AN AREA,**
14 **DOESN'T THAT MEAN IT HAS TO OFFER ITS SERVICE TO SMALL BUSINESS**
15 **CUSTOMERS AS WELL AS TO LARGE BUSINESS CUSTOMERS?**

16 A. As a practical matter, no. For example, a CLEC may have "construction" expenses that
17 apply if the CLEC extends its lines to serve a small business customer. These could be
18 quite significant costs. It might make more economic sense for the CLEC to extend its
19 facilities to connect to a large business rather than to a small barbershop. The latter
20 extension would probably not be cost effective. The CLEC may technically be offering
21 service to both large and small customers in a given area but the service may be
22 offered only if the customer is willing to pay thousands of dollars in "construction"
23 charges. Such charges would make the service too costly and thus not "substitutable."
24

²"The Status of Telecommunications Competition in Utah", November 2002, page 3.

1 **Q. DOES THE CLEC HAVE TO BE OFFERING SERVICE AT A PRICE SIMILAR TO THE**
2 **ILEC FOR THAT TO BE A “SUBSTITUTABLE” SERVICE?**

3 A. Yes. Utah Administrative Code Rule R746-351-2(C) provides the definition of
4 “substitutable” service as follows:

5 “Substitute or Substitutable Service” means a service offered by a CLEC
6 that is an economic alternative in terms of quality, quantity, and price to
7 that provided by the ILEC.
8

9 The Utah Administrative Code Rule R746-351-4(D) states that the ILEC applying for
10 pricing flexibility must identify “same or substitutable” CLEC services:

11 The specific ILEC services, form the list of the public telecommunications
12 services identified by the Commission pursuant to R746-351-3(A)(2), to be
13 priced flexibly by the ILEC in the defined geographic area that are the
14 same or substitutable for the public telecommunications services provided
15 by the CLEC in the defined geographic area;
16

17 **Q. DOES THE QWEST FILING MEET THE CRITERIA FOR MAKING PRICE**
18 **FLEXIBILITY EFFECTIVE FOR SMALL BUSINESS CUSTOMERS?**

19 A. No. In its petition and testimony Qwest has not demonstrated that the CLECs are
20 offering the “same or substitutable” services to small business customers in the
21 geographic areas that are being addressed. As such, Qwest has failed to meet the
22 statutory requirements that need to be satisfied in order for price flexibility to be
23 implemented for small business customers.
24

25 **Q. WHAT IS YOUR PRIMARY RECOMMENDATION?**

26 A. Qwest has failed to demonstrate that the CLEC’s are offering the same or substitutable
27 services to small business customers throughout the referenced geographic areas.

1 Therefore, I recommend that price flexibility not be implemented for business customers
2 that subscribe to four or fewer lines of service.

3
4 The Commission rules require the petitioning ILEC to demonstrate that the CLEC's are
5 offering the "same or substitutable" services in the defined geographic area. Qwest has
6 not demonstrated that the CLEC's are offering the same or substitutable services to
7 small business customers.

8
9 **Q. CAN YOU PLEASE EXPLAIN WHY A CLEC WOULD EFFECTIVELY OFFER**
10 **SERVICES TO LARGE BUSINESSES BUT NOT TO THE SMALL ONES?**

11 A. Yes. There are several reasons why a CLEC may concentrate its marketing efforts on
12 large businesses and not on small business customers. These reasons include:

13
14 (1) A CLEC can market to large businesses more efficiently. As is true of any company,
15 the CLECs have limited resources. The CLECs have limited sales and marketing
16 personnel, and have limited advertising budgets. If a CLEC salesperson can convince a
17 large business consumer to purchase services from the CLEC, the benefit is that the
18 CLEC will be providing many telecommunications services to the large business
19 customer (e.g. many lines of service, etc.).

20
21 Alternatively, if a CLEC uses its time in attempting to convince a neighborhood
22 barbershop owner to purchase services from the CLEC, the benefit is that the CLEC will

1 be providing very few telecommunications services to the business consumer (e.g. only
2 one or two lines of service).

3
4 It is important recognize that the marketing effort required to convince customers to
5 change their current carrier is a market expense that the CLEC's must bear, but is a
6 cost the ILEC's do not have³. When competition starts the ILEC's have almost all the
7 customers. The ILECs do not need to convince the customers to switch to them,
8 because the ILEC's already have the customers. On the other hand the CLEC's have
9 virtually none of the customers, and therefore the CLEC's must incur the expense of
10 trying to convince customers to change.

11
12 Since the benefits are so much higher if the CLEC can convince a large business
13 customer to subscribe to its services, it is logical that the CLEC concentrate its
14 marketing resources on large business customers instead of small business customers.

15
16 (2) Because a CLEC can generally sign up only a small percentage of the customers in
17 a given area, it is easier for a CLEC to achieve economies of scale with large business
18 customers than with small business customers. To illustrate this problem, assume a
19 facilities-based CLEC and a street with 100 lines in service, all serving one business. If
20 the CLEC signs up that one business, the CLEC will serve all of the 100 lines on that

³ Only after the CLEC's take some market share, would the ILEC start incurring a marketing expense in the attempt to try and switch those customers back.

1 street. If the CLEC buried a cable down that street, the cable would be used to serve all
2 of the 100 lines of service.

3
4 Assume another street also contains 100 lines of service, but those lines are split up
5 among 100 small businesses. No matter how hard they market, the CLEC will not be
6 able to convince all of those 100 businesses to switch from Qwest. For one thing, some
7 businesses do not even accept telemarketing or sales calls. Assume that the CLEC
8 signs up 10% of the businesses on the street. If the CLEC installs a cable down that
9 street it would then have to support the costs of installing that cable with only 10 lines of
10 revenue producing service. In addition, Qwest still serves the remaining 90 lines on
11 that street. The cost of digging a trench is about the same regardless of the size of
12 cable installed.⁴ Even if the CLEC was as efficient as installing cable as Qwest, the
13 CLEC's cable cost per line would be many times the Qwest cost per line. This is true
14 because the CLEC would not have as high a market share in that area as Qwest. The
15 CLEC would therefore have to spread their cable installation costs over fewer revenue
16 producing lines.

17
18 If a facilities-based CLEC serves one small business customer here and another small
19 business customer a few blocks away, that does not lead to the efficient use of the
20 CLEC's cable facilities.

1 (3) Some CLEC's offer services through "DS-1" technology. "DS-1" has a capacity that
2 is equivalent to twenty-four voice telephone lines. For this technology to be efficiently
3 used, the CLEC needs to have enough revenue-generating lines to fill up a significant
4 portion of a twenty-four-line capacity of the DS-1. Businesses with one to four lines of
5 telephone service would not generally be attractive to a CLEC offering services using
6 DS-1 technology.

7
8 **II. A MAXIMUM PRICE IS NEEDED TO PROTECT SMALL BUSINESS CUSTOMERS**

9
10 **Q. DO YOU HAVE AN ALTERNATIVE RECOMMENDATION?**

11 A. Yes. As previously discussed, my primary recommendation is that the Commission not
12 allow price flexibility to be implemented for small businesses in the relevant geographic
13 areas. However, if the Commission does decide to extend price flexibility to small
14 business customers in the applicable geographic areas, the Commission should
15 establish a maximum price to protect those small business customers.

16
17 **Q. DOES THE UTAH PUBLIC TELECOMMUNICATIONS LAW ALLOW THE**
18 **COMMISSION TO ESTABLISH A MAXIMUM PRICE TO PROTECT THE PUBLIC**
19 **INTEREST IN AREAS WHERE PRICING FLEXIBILITY BECOMES EFFECTIVE?**

20 A. Yes. §54-8b-2.3(8) of the Utah Public Telecommunications Law ("Law") states:

⁴ This assumes a given depth. This includes the cost of covering the cable and restoring the surface similar statements are true for "boring." This is true for plowing if the cable sizes are within the capability of the plow.

1 **The Commission may, as determined necessary to protect the public**
2 **interest, set an upper limit on the price that may be charged by**
3 telecommunications corporations for public telecommunications services
4 that may be priced by means of a price list or competitive contract.
5 (emphasis added)
6

7 Since the competitive alternatives available to small business consumers are fewer than
8 those for large business customers, I recommend that the prices for small business
9 customers be capped at the current tariffed price:
10

11 **Q. COULD YOU PLEASE SUMMARIZE YOUR RECOMMENDATION FOR THE AREAS**
12 **ADDRESSED IN THE PETITION?**

13 A. Yes. I recommend that price flexibility not be granted for business customers with four
14 or fewer lines of service. As an alternative, if price flexibility is granted, the rates for
15 businesses with four or fewer lines should have a maximum price equal to the current
16 tariffed price.
17

18 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

19 A. Yes.

William Dunkel, Consultant
8625 Farmington Cemetery Road
Pleasant Plains, Illinois 62677

Qualifications

The Consultant is a consulting engineer specializing in telecommunication regulatory proceedings. He has participated in over 140 state regulatory proceedings as listed on the attached Relevant Work Experience.

The Consultant has provided cost analysis, rate design, jurisdictional separations, depreciation, expert testimony and other related services to state agencies throughout the country in numerous telecommunication state proceedings. The Consultant has also provided depreciation testimony to state agencies throughout the country in several electric utility proceedings.

The Consultant made a presentation pertaining to Video Dial Tone at the NASUCA 1993 Mid-Year Meeting held in St. Louis.

In addition, the Consultant also made a presentation to the NARUC Subcommittee on Economics and Finance at the NARUC Summer Meetings held in July, 1992. That presentation was entitled "The Reason the Industry Wants to Eliminate Cost Based Regulation--Telecommunications is a Declining Cost Industry."

The Consultant provides services almost exclusively to public agencies, including the Public Utilities Commission, the Public Counsel, or the State Department of Administration in various states.

William Dunkel currently provides, or in the past has provided, services in telecommunications proceedings to the following clients:

The Public Utility Commission or the Staffs in the States of:

Arkansas	Mississippi
Arizona	Missouri
Delaware	New Mexico
Georgia	Utah
Guam	Virginia
Illinois	Washington
Maryland	U.S. Virgin Islands

The Office of the Public Advocate, or its equivalent, in the States of:

Colorado	Maryland
District of Columbia	Missouri
Georgia	New Jersey
Hawaii	New Mexico
Illinois	Ohio
Indiana	Pennsylvania
Iowa	Utah
Maine	Washington

The Department of Administration in the States of:

Illinois	South Dakota
Minnesota	Wisconsin

In April, 1974, the Consultant was employed by the Illinois Commerce Commission in the Electric Section as a Utility Engineer. In November of 1975, he transferred to the Telephone Section of the Illinois Commerce Commission and from that time until July, 1980, he participated in essentially all telephone rate cases and other telephone rate matters that were set for hearing in the State of Illinois. During that period, he testified as an expert witness in numerous rate design cases and tariff filings in the areas of rate design, cost studies and separations. During the period 1975-1980, he was the Separations and Settlements expert for the Staff of the Illinois Commerce Commission.

From July, 1977 until July, 1980, he was a Staff member of the FCC-State Joint Board on Separations, concerning the "Impact of Customer Provision of Terminal Equipment on Jurisdictional Separations" in FCC Docket No. 20981 on behalf of the Illinois Commerce Commission. The FCC-State Joint Board is the national board which specifies the rules for separations in the telephone industry.

The Consultant has taken the AT&T separations school which is normally provided to the AT&T personnel.

The Consultant has taken the General Telephone separations school which is normally provided for training of the General Telephone Company personnel in separations.

Since July, 1980 he has been regularly employed as an independent consultant in telephone rate proceedings across the nation.

He has testified before the Illinois House of Representatives Subcommittee on Communications, as well as participating in numerous other schools and conferences pertaining to the utility industry.

Prior to employment at the Illinois Commerce Commission, the Consultant was a design engineer for Sangamo Electric Company designing electric watt-hour meters used in the electric utility industry. The Consultant was granted patent No. 3822400 for a solid state meter pulse initiator.

The Consultant graduated from the University of Illinois in February, 1970 with a Bachelor's of Science Degree in Engineering Physics with emphasis on economics and other business-related subjects. The Consultant has taken several post-graduate courses since graduation.

RELEVANT WORK EXPERIENCE OF WILLIAM DUNKEL

ARIZONA

- | | |
|----------------------------|-----------------------------|
| - U.S. West Communications | Cost of Service Study |
| Wholesale cost/UNE case | Docket No. T-00000A-00-0194 |
| General rate case | Docket No. E-1051-93-183 |
| Depreciation case | Docket No. T-01051B-97-0689 |
| General rate case | Docket No. T-01051B-99-0105 |

ARKANSAS

- | | |
|---------------------------------------|---------------------|
| - Southwestern Bell Telephone Company | Docket No. 83-045-U |
|---------------------------------------|---------------------|

CALIFORNIA

(on behalf of the California Cable Television Association)

- | | |
|--|-------------|
| - General Telephone of California | I.87-11-033 |
| - Pacific Bell | |
| Fiber Beyond the Feeder Pre-Approval Requirement | |

COLORADO

- | | |
|-----------------------------------|----------------------------|
| - Mountain Bell Telephone Company | |
| General Rate Case | Docket No. 96A-218T et al. |
| Call Trace Case | Docket No. 92S-040T |
| Caller ID Case | Docket No. 91A-462T |
| General Rate Case | Docket No. 90S-544T |
| Local Calling Area Case | Docket No. 1766 |
| General Rate Case | Docket No. 1720 |
| General Rate Case | Docket No. 1700 |
| General Rate Case | Docket No. 1655 |
| General Rate Case | Docket No. 1575 |
| Measured Services Case | Docket No. 1620 |
| - Independent Telephone Companies | |
| Cost Allocation Methods Case | Docket No. 89R-608T |

DELAWARE

- | | |
|-----------------------------------|-----------------------|
| - Diamond State Telephone Company | |
| General Rate Case | PSC Docket No. 82-32 |
| General Rate Case | PSC Docket No. 84-33 |
| Report on Small Centrex | PSC Docket No. 85-32T |
| General Rate Case | PSC Docket No. 86-20 |
| Centrex Cost Proceeding | PSC Docket No. 86-34 |

DISTRICT OF COLUMBIA

- | | |
|---------------------------------|---------------------|
| - C&P Telephone Company of D.C. | |
| Depreciation issues | Formal Case No. 926 |

FCC

- | | |
|--|----------------------|
| - Review of jurisdictional separations | FCC Docket No. 96-45 |
| Developing a Unified Inter-carrier | |
| Compensation Regime | CC Docket No. 01-92 |

FLORIDA

- | | |
|------------------------------|-----------------------------|
| - BellSouth, GTE, and Sprint | |
| Fair and reasonable rates | Undocketed, Special Project |

GEORGIA

- Southern Bell Telephone & Telegraph Co.
 - General Rate Proceeding Docket No. 3231-U
 - General Rate Proceeding Docket No. 3465-U
 - General Rate Proceeding Docket No. 3286-U
 - General Rate Proceeding Docket No. 3393-U

HAWAII

- GTE Hawaiian Telephone Company
 - Depreciation/separations issues Docket No. 94-0298
 - Resale case Docket No. 7702

ILLINOIS

- Geneseo Telephone Company
 - EAS case Docket No. 99-0412
- Central Telephone Company
 - (Staunton merger) Docket No. 78-0595
- General Telephone & Electronics Co.
 - Usage sensitive service case Docket Nos. 98-0200/98-0537
 - General rate case (on behalf of CUB) Docket No. 93-0301
 - (Usage sensitive rates) Docket No. 79-0141
 - (Data Service) Docket No. 79-0310
 - (Certificate) Docket No. 79-0499
 - (Certificate) Docket No. 79-0500
- General Telephone Co.
 - Docket No. 80-0389
- Ameritech (Illinois Bell Telephone Company)
 - Alternative Regulation Review Docket No. 98-0252
 - Area code split case Docket No. 94-0315
 - General Rate Case Docket No. 83-0005
 - (Centrex filing) Docket No. 84-0111
 - General Rate Proceeding Docket No. 81-0478
 - (Call Lamp Indicator) Docket No. 77-0755
 - (Com Key 1434) Docket No. 77-0756
 - (Card dialers) Docket No. 77-0757
 - (Concentration Identifier) Docket No. 78-0005
 - (Voice of the People) Docket No. 78-0028
 - (General rate increase) Docket No. 78-0034
 - (Dimension) Docket No. 78-0086
 - (Customer controlled Centrex) Docket No. 78-0243
 - (TAS) Docket No. 78-0031
 - (Ill. Consolidated Lease) Docket No. 78-0473
 - (EAS Inquiry) Docket No. 78-0531
 - (Dispute with GTE) Docket No. 78-0576
 - (WUI vs. Continental Tel.) Docket No. 79-0041
 - (Carle Clinic) Docket No. 79-0132
 - (Private line rates) Docket No. 79-0143
 - (Toll data) Docket No. 79-0234
 - (Dataphone) Docket No. 79-0237
 - (Com Key 718) Docket No. 79-0365
 - (Complaint - switchboard) Docket No. 79-0380
 - (Porta printer) Docket No. 79-0381
 - (General rate case) Docket No. 79-0438
 - (Certificate) Docket No. 79-0501
 - (General rate case) Docket No. 80-0010
 - (Other minor proceedings) Docket No. various
- Home Telephone Company
 - Docket No. 80-0220

-	Northwestern Telephone Company	
	Local and EAS rates	Docket No. 79-0142
	EAS	Docket No. 79-0519
INDIANA		
-	Public Service of Indiana (PSI)	
	Depreciation issues	Cause No. 39584
-	Indianapolis Power and Light Company	
	Depreciation issues	Cause No. 39938
IOWA		
-	U S West Communications, Inc.	
	Local Exchange Competition	Docket No. RMU-95-5
	Local Network Interconnection	Docket No. RPU-95-10
	General Rate Case	Docket No. RPU-95-11
KANSAS		
-	Southwestern Bell Telephone Company	
	Commission Investigation of the KUSF	Docket No. 98-SWBT-677-GIT
-	Rural Telephone Service Company	
	Audit and General rate proceeding	Docket No. 00-RRLT-083-AUD
	Request for supplemental KUSF	Docket No. 00-RRLT-518-KSF
-	Southern Kansas Telephone Company	
	Audit and General rate proceeding	Docket No. 01-SNKT-544-AUD
-	Pioneer Telephone Company	
	Audit and General rate proceeding	Docket No. 01-PNRT-929-AUD
-	Craw-Kan Telephone Cooperative, Inc.	
	Audit and General rate proceeding	Docket No. 01-CRKT-713-AUD
-	Sunflower Telephone Company, Inc.	
	Audit and General rate proceeding	Docket No. 01-SFLT-879-AUD
-	Bluestem Telephone Company, Inc.	
	Audit and General rate proceeding	Docket No. 01-BSST-878-AUD
-	Home Telephone Company, Inc.	
	Audit and General rate proceeding	Docket No. 02-HOMT-209-AUD
-	Wilson Telephone Company, Inc.	
	Audit and General rate proceeding	Docket No. 02-WLST-210-AUD
-	S&T Telephone Cooperative Association, Inc.	
	Audit and General rate proceeding	Docket No. 02-S&TT-390-AUD
-	Blue Valley Telephone Company, Inc.	
	Audit and General rate proceeding	Docket No. 02-BLVT-377-AUD
-	JBN Telephone Company	
	Audit and General rate proceeding	Docket No. 02-JBNT-846-AUD
MAINE		
-	New England Telephone Company	
	General rate proceeding	Docket No. 92-130
MARYLAND		
-	Chesapeake and Potomac Telephone Company	
	General rate proceeding	Docket No. 7851
	Cost Allocation Manual Case	Case No. 8333
	Cost Allocation Issues Case	Case No. 8462
-	Verizon Maryland	
	PICC rate case	Case No. 8862
	USF case	Case No. 8745

MINNESOTA

- Access charge (all companies) Docket No. P-321/CI-83-203
- U. S. West Communications, Inc. (Northwestern Bell Telephone Co.)
 - Centrex/Centron proceeding Docket No. P-421/91-EM-1002
 - General rate proceeding Docket No. P-321/M-80-306
 - Centrex Dockets MPUC No. P-421/M-83-466
 - MPUC No. P-421/M-84-24
 - MPUC No. P-421/M-84-25
 - MPUC No. P-421/M-84-26
 - General rate proceeding MPUC No. P-421/GR-80-911
 - General rate proceeding MPUC No. P-421/GR-82-203
 - General rate case MPUC No. P-421/GR-83-600
 - WATS investigation MPUC No. P-421/CI-84-454
 - Access charge case MPUC No. P-421/CI-85-352
 - Access charge case MPUC No. P-421/M-86-53
 - Toll Compensation case MPUC No. P-999/CI-85-582
 - Private Line proceeding Docket No. P-421/M-86-508
- AT&T
 - Intrastate Interexchange Docket No. P-442/M-87-54

MISSISSIPPI

- South Central Bell
 - General rate filing Docket No. U-4415

MISSOURI

- Southwestern Bell
 - General rate proceeding TR-79-213
 - General rate proceeding TR-80-256
 - General rate proceeding TR-82-199
 - General rate proceeding TR-86-84
 - General rate proceeding TC-89-14, et al.
 - Alternative Regulation TC-93-224/TO-93-192
- United Telephone Company
 - Depreciation proceeding TR-93-181
- All companies
 - Extended Area Service TO-86-8
 - EMS investigation TO-87-131
 - Cost of Access Proceeding TR-2001-65

NEW JERSEY

- New Jersey Bell Telephone Company
 - General rate proceeding Docket No. 802-135
 - General rate proceeding BPU No. 815-458
 - Phase I - General rate case OAL No. 3073-81
 - BPU No. 8211-1030
 - OAL No. PUC10506-82
 - General rate case BPU No. 848-856
 - OAL No. PUC06250-84
 - Division of regulated BPU No. TO87050398
 - from competitive services OAL No. PUC 08557-87
 - Customer Request Interrupt Docket No. TT 90060604

NEW MEXICO

- U.S. West Communications, Inc.
 - E-911 proceeding Docket No. 92-79-TC
 - General rate proceeding Docket No. 92-227-TC

	General rate/depreciation proceeding	Case No. 3008
	Subsidy Case	Case No. 3325
	USF Case	Case No. 3223
-	VALOR Communications	
	Subsidy Case	Case No. 3300
OHIO		
-	Ohio Bell Telephone Company	
	General rate proceeding	Docket No. 79-1184-TP-AIR
	General rate increase	Docket No. 81-1433-TP-AIR
	General rate increase	Docket No. 83-300-TP-AIR
	Access charges	Docket No. 83-464-TP-AIR
-	General Telephone of Ohio	
	General rate proceeding	Docket No. 81-383-TP-AIR
-	United Telephone Company	
	General rate proceeding	Docket No. 81-627-TP-AIR
OKLAHOMA		
-	Public Service of Oklahoma	
	Depreciation case	Cause No. 96-0000214
PENNSYLVANIA		
-	GTE North, Inc.	
	Interconnection proceeding	Docket No. A-310125F002
-	Bell Telephone Company of Pennsylvania	
	Alternative Regulation proceeding	Docket No. P-00930715
	Automatic Savings	Docket No. R-953409
	Rate Rebalance	Docket No. R-00963550
-	Enterprise Telephone Company	
	General rate proceeding	Docket No. R-922317
-	All companies	
	InterLATA Toll Service Invest.	Docket No. I-910010
-	GTE North and United Telephone Company	
	Local Calling Area Case	Docket No. C-902815
SOUTH DAKOTA		
-	Northwestern Bell Telephone Company	
	General rate proceeding	Docket No. F-3375
TENNESSEE		
(on behalf of Time Warner Communications)		
-	BellSouth Telephone Company	
	Avoidable costs case	Docket No. 96-00067
UTAH		
-	U.S. West Communications (Mountain Bell Telephone Company)	
	General rate case	Docket No. 84-049-01
	General rate case	Docket No. 88-049-07
	800 Services case	Docket No. 90-049-05
	General rate case/ incentive regulation	Docket No. 90-049-06/90- 049-03
	General rate case	Docket No. 92-049-07
	General rate case	Docket No. 95-049-05
	General rate case	Docket No. 97-049-08
VIRGIN ISLANDS, U.S.		

- Virgin Islands Telephone Company
 - General rate case Docket No. 264
 - General rate case Docket No. 277
 - General rate case Docket No. 314
 - General rate case Docket No. 316

- VIRGINIA
 - General Telephone Company of the South
 - Jurisdictional allocations Case No. PUC870029
 - Separations Case No. PUC950019

- WASHINGTON
 - US West Communications, Inc.
 - Interconnection case Docket No. UT-960369
 - General rate case Docket No. UT-950200
 - All Companies-
 - Analyzed the local calling areas in the State

- WISCONSIN
 - Wisconsin Bell Telephone Company
 - Private line rate proceeding Docket No. 6720-TR-21
 - General rate proceeding Docket No. 6720-TR-34